

**FEDERAL PUBLIC DEFENDER
DISTRICT OF NEW JERSEY**

RICHARD COUGHLIN
FEDERAL PUBLIC DEFENDER

1002 Broad Street
Newark, New Jersey 07102

CHESTER M. KELLER
FIRST ASSISTANT

Hon. Cathy L. Waldor
United States District Court
District of New Jersey
50 Walnut Street
Newark, NJ 07102

March 6, 2021

Re: *United States v. Maria Bell*, Case Nos. 2:20-mj-9451

Dear Judge Waldor:

Based on comments by the prosecutor during the lengthy telephone conference on March 5, 2021, counsel is concerned about an impression that Ms. Bell's current bond motion has been litigated numerous times and the defense is simply treading the same terrain. That is not true, however. As difficult as it may be given the procedural history of this case, we ask the Court to be cognizant of any *status quo* bias in reviewing the instant motion. The fact that Ms. Bell was previously denied bond should not affect the Court's review of the instant motion, which proposes far more stringent measures and greater sacrifices by Ms. Bell and her family than prior motions. All while she is still purportedly presumed innocent of this crime—a crime that the government does not allege harmed, or was motivated by any attempt to harm, a single person.

Ms. Bell has no criminal history whatsoever at the age of 53, has two upstanding adult sons and a beloved infant grandson in New Jersey, and has a long history of caring for others who are sick or who need mentoring. The fact that she has spent over 100 days incarcerated while presumed innocent is an affront to the Bail Reform Act, and frankly—given the many defendants charged with harming people who are routinely released under far less strict conditions, even when they have histories of violating court supervision—to the equal application of the law. The defense is absolutely confident that Ms. Bell will follow the conditions of release imposed on her by the Court. So is her partner, and so are her two sons, who once again are happy to address the Court should it have any doubt about who their mom really is.

For the foregoing reasons, we ask for bond. We also ask that Ms. Bell be produced for any future conferences in this case and that they be recorded.

Respectfully submitted,

/s/ Rahul Sharma, AFPD
(973) 320-7350
rahul_sharma@fd.org